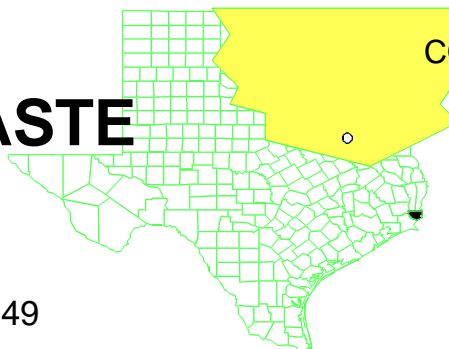


BAILEY WASTE DISPOSAL TEXAS

EPA ID# TXD980864649



EPA REGION 6
CONGRESSIONAL DISTRICT 02
Orange County

Other Names:
Gulf States Utility
Bailey's Sabine Lake Bridge

Updated: 7/17/97

Site Description

- Location:**
- Three miles southwest Bridge City, Orange County, Texas.
 - North of Neches River near Highway 87.
- Population:**
- The immediate site area is sparsely populated.
 - Approximately 7,600 people within three miles of the site use wells for drinking water.
- Setting:**
- The nearest residence to the site is two miles.
 - Nearest drinking water well is 1,200 feet.
 - The site is situated in a marsh area.
 - The site is characterized by a series of waste pits, a drainage channel, a drum disposal area, a waste channel, and a large surface impoundment.
 - Waste has been documented on ten acres of the site.
- Hydrology:**
- Gulf Coast Aquifer.
 - Seasonal high level is about 5 ft.
 - Silty clay layer beneath the site.
 - Shallow ground water is contaminated with organic chemicals and heavy metals.
 - Area drinking water wells are located in deeper aquifers which show no contamination from the site.

Wastes and Volumes

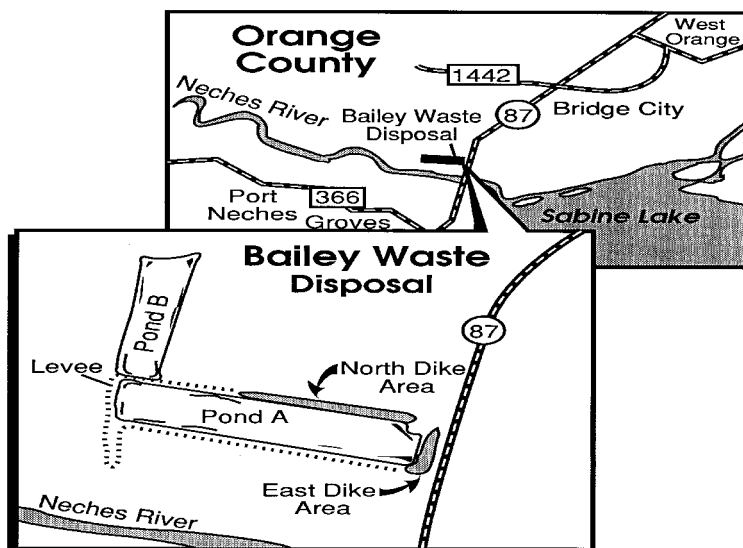
- The principal pollutants at the Bailey Waste Disposal site are metals, arsenic compounds, benzene, phenols, pyridenes, naphthalenes, and chlorinated hydrocarbons in soil.
- Waste volume is approximately 156,000 cubic yards

Site Assessment and Ranking

NPL LISTING HISTORY

Site HRS Score: 53.42
Proposed Date: 10/05/84
Final Date: 5/20/86
NPL Update: No. 2

Site Map and Diagram



The Remediation Process

Site History:

- The site began receiving industrial and municipal wastes in 1950.
- Gulf State Utilities purchased the property in 1971.
- The site was identified in the 1979 Eckardt Report
- In November and December 1984, the Potentially Responsible Parties (PRPs), with EPA oversight, fenced the site and posted warning signs.
- The Remedial Investigation (RI) was conducted by the Texas Department of Water Resources (TDWR), now the Texas Natural Resource Conservation Commission (TNRCC), from 12/84 to 10/87.
- The PRPs conducted the Feasibility Study (FS) from 10/87 to 3/88, with EPA oversight.

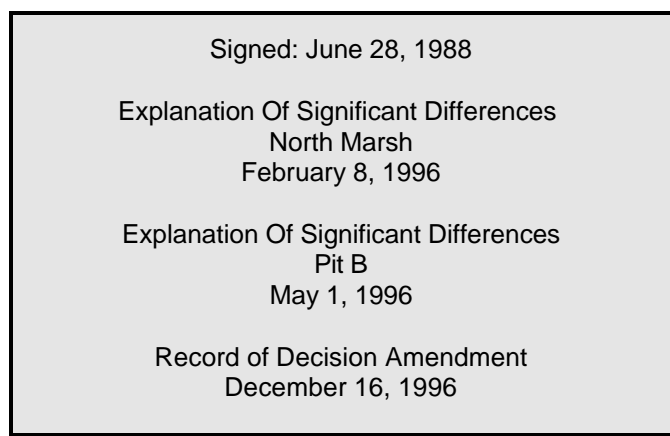
Health Considerations:

- Analysis conducted by the state revealed chloroform, phthalates, trichloroethylene, and other compounds in surface water, ground water, and soils on the site.

Other Environmental Risks:

- About 7600 people within three miles of the site use ground water as their primary source of drinking water.
- Marsh was directly impacted from the waste which has migrated into it. Waste has been removed from marsh.

Record of Decision



• Soil Treatment:

- Contaminated material from the drum disposal area and drainage channel are to be moved (consolidated) to the waste channel. An Explanation of Significant Difference (ESD) was issued by the EPA to address the contaminated marsh sediments. These sediments have been taken off-site for disposal in a Class 1 industrial waste landfill (see Present Status and Issues section below for further discussion this ESD).
- The consolidated material will then be stabilized by solidification to prevent movement off-site.

Other Remedies Considered

1. No Action
2. On-site landfill
3. Off-site landfill
4. On-site Incineration
5. On-site Incineration, and Off-site landfill

Reason Not Chosen

Not protective of human health and the environment
Short term impacts
Short term impacts
Short term impacts, implementability
Short term impacts, implementability

Remedial Timeline

- The Bailey Site Settlers Committee (PRPs) initiated the Remedial Design in 3/89.
- Construction of the remedy, or Remedial Action (RA) by the PRPs began in 2/92.

Community Involvement

- Community Involvement Plan: Developed 6/85, revised 3/89
- Open houses and workshops: 11/84, 2/85, 10/85, 8/92, 7/93
- Proposed Plan Fact Sheet and Public Meeting: 5/88
- ROD Fact Sheet: 7/88
- Explanation of Significant Difference Newspaper Public Notice: 4/96
- ROD Amendment Public Meeting: 10/96
- Milestone Fact Sheets: 10/85, 9/89, 10/89, 6/90, 2/92, 8/92, 2/93, 7/93, 9/95
- Citizens on site mailing list: 96
- Constituency Interest: Citizen interest in the site is low.
- Site Repository: Nederland Public Library, 1903 Atlanta, Nederland, Texas 77627 409-722-1255

Technical Assistance Grant

- Availability Notice: 2/89
- Letters of Intent Received: None
- Grant Award: N/A

- Current Status: No apparent citizen interest in the grant.

Fiscal and Program Management

- **Remedial Project Manager (EPA):** Chris Villarreal, 214-665-6758, Mail Code: 6SF-AP
- **State Contact:** (TNRCC) Trey Collins, 512/239-2030, Mail Code: 144
- **Community Involvement Coordinator (EPA):** Donn Walters, 214-665-6483, Mail Code: 6SF-P
- **Attorneys (EPA):** Anne Foster, 214-665-2169; Pam Travis, 214-665-8056, Mail Code: 6SF-DL
- **State Coordinator (EPA):** Shirley Workman, 214-665-8522, Mail Code: 6SF-AT
- **Prime Contractor:** Flour Daniel (EPA Oversight)

Cost Recovery: PRP Lead (Enforcement)

- PRPs Identified: 22
- Viable PRP: 22 - Bailey Site Settlers Committee
- The RD/RA Consent Decree was entered on April 30, 1990.
- This first Consent Decree involves an 80/20 mixed funding.
- A second Consent Decree was entered on November 6, 1995. The Second Consent Decree recovers approximately 85% of monies not recovered by the first Consent Decree. The combination of the first and second Consent Decrees results in the PRPs paying approximately 97% of the total monies expended for the site's RD/RA.

Present Status and Issues

- Fencing the area and posting warning signs have limited access to the site, thereby reducing the potential of exposure to hazardous substances at the Bailey Waste Disposal while planned cleanup activities are under way.
- Remedy construction (Remedial Action) by the PRPs with EPA oversight is continuing.

- The onsite in situ stabilization of wastes began in September 1993. The PRP's contractor has had problems meeting the project stabilization requirements. Efforts to resolve this problem have included conducting an independent in situ stabilization field pilot. The PRPs, as directed by the EPA, reevaluated the original remedy and developed potential remedy alternatives.
- An Explanation of Significant Differences (2/8/96) addressing waste in the site's North Marsh area has been implemented by the PRPs. Affected marsh sediments, which make up less than four percent of the total site waste, have been excavated from the North Marsh and taken off-site for disposal in a Class 1 industrial waste landfill rather than being relocated, stabilized and capped onsite. Reasons for this remedy component change include:
 - 1) the opportunity to expedite the affected marsh sediments remedy component by taking these sediments off-site for disposal;
 - 2) the excavation of the affected marsh sediments, which are the only site waste not contained within a levee, will remove these sediments from direct contact with the marsh sediments;
 - 3) remediation activities within the Waste Channel Area, which was to have received the affected marsh sediments, are currently being reevaluated; and
 - 4) an estimated \$900,000 in costs savings for the affected marsh sediment remedy component.

- An Explanation of Significant Differences (5/01/96) address waste in the site's Pit B has been implemented by the PRPs. Approximately 12,000 cubic yards of waste and affected sediments contained within Pit B have been excavated and taken off-site for disposal. Pit B may have been the source of waste which had migrated into the North Marsh.

- A Record of Decision Amendment (12/16/96) was issued after the end of a public comment period in which EPA received no comments either in writing or during the ROD Amendment public meeting. The amended remedy calls for the following remedy components:

- waste consolidation within the site's waste areas (i.e., East Dike Area, North Dike Area);
- grading of the waste using general fills to provide a mild slope for the base of the cap and to promote storm water runoff;
- construction of a lightweight composite cap and related appurtenances with modification as appropriate to satisfy site-specific design criteria and constraints;
- installation of a consolidation water collection system to intercept and remove groundwater that rises in the short term (i.e., during construction of the cap) due to consolidation of the waste; this water will be treated on-site using the on-site treatment facility (if the treatment facility is unable to adequately treat the water, it will be taken off-site for disposal);
- installation of storm water management controls to treat storm water runoff from disturbed areas during construction and to divert storm water away from inactive or completed areas of the site;
- modifications to existing dikes and side slopes to include adjustment of top elevations to tie into the cap, repair/modifications of areas that have experienced excessive settlement, and erosion/slope protection measures; and
- construction and maintenance of access roads.

The amended remedy in combination with the two previous ESDs will provide an overall site remedy that is protective of human health and the environment and complies with Federal and State applicable or relevant and appropriate requirements.

In January 1997, construction activities for the Amended ROD began. Construction activities are scheduled to be complete by the end of the year.

Benefits

- Over 156,000 cubic yards of hazardous materials will be remedied to prevent offsite migration.
- Sensitive wetlands will be protected and made safe for wildlife and recreational activities.